

## REMARKS

Reconsideration of the present application is requested.

Claim 1, which was rejected over Delaney et al., has been replaced by claim 18 which recites that the plate element extends across upper edges of the electrodes. In contrast, Delaney et al. has no such structure, but rather discloses a structure similar to that described in the present application in connection with Figs. 29a-29c.

By providing a plate element (e.g., see preferred plate element 4) that extends across the upper edges of the electrodes, surging electrolyte that would have otherwise been able to flow upwardly past the upper edges of the electrode plates (e.g., during vehicle deceleration) is constrained against so doing, thereby intensifying the tendency for the electrolyte to flow downwardly toward the flow channel (e.g., the preferred flow channel 5) and then upwardly through the channel. That benefit is not attained in the battery of Delaney et al. Accordingly, it is submitted that claim 18 distinguishes patentably over Delaney et al.

Original claim 10, which was rejected over Braun, has been replaced by claim 27 which recites that the heating element is disposed externally of the casing. In contrast, Braun's heating elements are inside of the casing. Braun wants to heat electrolyte during low outside temperatures. In contrast, the *presently claimed invention* seeks to improve circulation and thus the heating element need not be disposed inside the casing. Accordingly, it is submitted that claim 27 distinguishes patentably over Braun.

Note also that dependent claim 29 is allowable for the same reasons as claim 18.

Original claim 15 which was rejected over Bolger, has been replaced by claim 31 which recites at least one cooling element disposed externally of the casing for cooling electrolyte through the casing. In contrast, Bolger circulates electrolyte by a pump disposed within the casing. Accordingly, it is submitted that claim 31 distinguishes patentably over Bolger.

Note also that dependent claim 32 is allowable for the same reasons as claim 18.

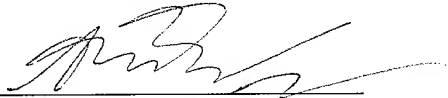
The specification and drawings have been amended to overcome the objections thereto.

In light of the foregoing, it is submitted that the application is in condition for allowance.

Respectfully submitted,

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